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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THE ESTATE OF FLORENCE COVINO,
by her Personal Representative,
BARBARA STEWART; PETER
COVINO, JR.; PETER COVINO III;
HEIDI COVINO LUEKENGA; AMMON
COVINO; VINCENT COVINO;
MELODY COVINO, each individually
And as heir of FLORENCE COVINO,
Deceased.

Case No:

PETITION FOR REMOVAL

Plaintiffs,

vs.

MALA GEOSCIENCE USA, INC., a
foreign corporation; MALA
GEOSCIENCE FORVALTNING AB, a
foreign corporation; GUIDELINE GEO AB, a
foreign corporation; JEFFREY HALL;
DOES I through 10, inclusive,

Defendants.

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN
DISTRICT OF NEVADA:

PLEASE TAKE NOTICE that Defendants, MALA GEOSCIENCE USA, INC. and
JEFFREY HALL, hereby remove the State action described herein to Federal Court. The
grounds for removal are as follows:

1. On August 30, 2013, an action was commenced in the Eighth Judicial District
Court, Clark County, Nevada, entitled "THE ESTATE OF FLORENCE COVINO, by her Personal
Representative, BARBARA STEWART; PETER COVINO, JR.; PETER COVINO III; HEIDI

1 COVINO LUEKENGA; AMMON COVINO; VINCENT COVINO; MELODY COVINO, each
2 individually And as heir of FLORENCE COVINO, Deceased, Plaintiffs vs. MALA GEOSCIENCE
3 USA, INC., a foreign corporation; MALA GEOSCIENCE FORVALTNING AB, a Foreign
4 corporation; JEFFREY HALL; DOES I through 10, inclusive, Defendant she Estate of Florence
5 Covino, by her Personal Representative, Barbara " - Case No. A-13-687767-C. That Complaint
6 was Amended on October 29, 2014 to include GUIDELINE GEO AB, a foreign corporation.

7 2. A copy of all process, pleadings and orders served upon Defendants, Mala
8 Geoscience USA, Inc. and Jeffrey Hall in the State Court action is attached hereto as Exhibit "A".

9 3. The instant action is a civil action of which this Court has original jurisdiction
10 under 28 U.S.C. §1332, and is one which may be removed to this Court by Defendants Mala
11 Geoscience USA, INC. and JEFFREY HALL pursuant to the provisions of 28 U.S.C. §1441(b), in
12 that it is a civil action between citizens of different states and the matter in controversy exceeds
13 the sum of \$75,000.00, exclusive of costs and interest. This is a wrongful death wherein
14 Plaintiffs are seeking policy limits of \$1,000,000.00.

15 4. There is diversity of citizenship between Plaintiffs and Defendants. Defendants
16 are informed and believes that the Plaintiffs are non-residents of the State of Nevada, as alleged
17 in their Complaint and Amended Complaint. Defendant, MALA GEOSCIENCE USA, INC. was at
18 the time of filing of this action, and still is, a corporation incorporated in the State of Delaware.
19 MALA GEOSCIENCE FORVALTING AB and GUIDELINE GEO AB, a foreign corporations
20 existing outside of the USA.

21 5. The matter in controversy exceeds \$75,000.00. Plaintiffs are seeking damages
22 for both special and general damages for the wrongful death of Florence Covino, as well as past
23 and future medical and wage loss of the Plaintiffs, grief and sorrow. Plaintiffs have previously
24 demanded the limits of Defendant's insurance of \$1,000,000.00.

25 6. Defendant MALA GEOSCIENCE, USA was served through its Registered Agent,
26 National Registered Agents, Inc. on December 2, 2013, and Defendant, JEFFREY HALL, was
27 served personally on December 1, 2013. Following repeated requests through Plaintiffs'
28 counsel, Defendants' counsel was provided with Proof of Service on these two Defendants on

January 16, 2014 (Attached hereto as Exhibit "B")

7. Pursuant to 28 U.S.C. §1446, a copy of this Notice of Removal is being filed with the Clerk of the Eighth Judicial District Court, Clark County, Nevada, and is further served on all parties hereto.

WHEREFORE, Defendants hereby remove the State action now pending against it in the Eighth Judicial District Court, Clark County, Nevada, Case No. A-13-687767-C, to this Court.

DATED this 29 day of January, 2014.

DENNETT WINSPEAR, LLP

By J. M. BENNETT, F.G.S.

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USA, INC. and JEFFREY HALL

USA, INC. and JEFFREY HALL

DENNETT WINSPEAR
ATTORNEYS AT LAW

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5 and LR 5-1, I certify that I am an employee of DENNETT WINSPEAR, LLP, and that on the 21 day of January, 2014 the foregoing ***PETITION FOR REMOVAL*** was served upon the parties via CM/ECF and U.S. Mail by depositing a true and correct copy thereof in the U.S. Mail, first class postage prepaid and addressed to the following parties:

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